

1 The parties further stipulate and agree that the time from November 7 through December
2 12, 2012, should be excluded in accordance with the provisions of the Speedy Trial Act, 18
3 U.S.C. §§ 3161(h)(7)(A) on the basis that the ends of justice are served by taking such action
4 which outweigh the best interest of the public and the defendant in a speedy trial and also
5 under subsection (B)(iv) for continuity of counsel and for effective preparation of counsel, taking
6 into account the exercise of due diligence.

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8 DATED: November 5, 2012

/s/
Michelle Kane
Assistant United States Attorney



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12 DATED: November 5, 2012

GARRICK LEW
Counsel for Defendant CHIANG

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16 **[Proposed] ORDER**

17 GOOD CAUSE APPEARING, and pursuant to the stipulation of the government and
18 defendant PAUL CHIANG,

19 IT IS HEREBY ORDERED that the Status Conference in this case, currently scheduled
20 for November 7, 2012 at 9:00 a.m. before the Honorable Lucy H. Koh, is VACATED and RESET
21 to December 12, 2012 at 9:00 a.m.

22 IT IS FURTHER ORDERED that the time from November 7, 2012 through December 12,
23 2012 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
24 3161(h)(7)(A) and (B)(iv) for adequate preparation of counsel ~~and continuity of counsel~~. The
25 Court finds that the ends of justice served by the granting of the continuance outweigh the best
26 interests of the public and the defendant in a speedy and public trial and the failure to grant the

No basis for continuity of
counsel finding as basis
for excluding time.

1 requested continuance would unreasonably deny ^{defense counsel} continuity of counsel and reasonable time
2 necessary for effective preparation.

3 SO ORDERED.

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5 DATED: 11/6/12

Lucy H. Koh
6 Honorable Lucy H. Koh
United States District Judge

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8 Further continuances of the status conference
9 will be disfavored. Defense counsel has
10 provided no facts supporting a finding
11 that continuity of counsel justified an
12 exclusion of time.
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